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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS, INC., et al.,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	Jointly Administered
	:	

**AMENDED VERIFIED STATEMENT OF PEPPER HAMILTON LLP  
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Pepper Hamilton LLP (“Pepper”), as counsel to the parties designated herein,  
hereby submits this amended verified statement pursuant to Rule 2019 of the Federal Rules of  
Bankruptcy Procedure, and states as follows:

1. Pepper has been retained to represent various creditors and parties in  
interest (collectively, the “Entities”) in these jointly administered chapter 11 cases. Some or all  
of the Entities may hold claims against the Debtors. The Entities are listed on Exhibit A, which  
is attached hereto and made a part hereof.

2. Each of the Entities has requested that Pepper represent them in the  
Debtors’ chapter 11 cases.

3. Upon information and belief, as of the date hereof, Pepper does not hold any claims against or any interest in the Debtors.

4. The Entities currently hold or will hold unsecured pre-petition claims, rejection damage claims and/or administrative priority claims. The full amount of each of the Entities' claims is undetermined at this time.

5. Pepper reserves the right to revise and supplement this statement as necessary.

I, Francis J. Lawall, hereby certify that this Verified Statement is true and accurate to the best of my knowledge, information, and belief.

Dated: December 8 , 2010

PEPPER HAMILTON LLP

By: /s/ Francis J. Lawall  
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**EXHIBIT A**

1. EnCana Corporation and EnCana Oil & Gas Partnership  
Box 28560  
Calgary, AB T2P 2S5, Canada
2. ING Bank, FSB  
ING Direct - Legal Department  
802 Delaware Avenue  
10th Floor, Wilmington, DE 19801
3. Pitcairn Property Holdings, Inc.  
165 Township Line Road  
Suite 1500,  
Jenkintown, PA 19046
4. RCN New York Communications LLC  
d/b/a RCN Metro Optical Networks  
RCN Telecom Services, Inc.  
196 Van Buren Street  
Herndon, VA 20170
5. ExxonMobil Gas Marketing Europe Limited  
ExxonMobil House  
Ermyrn Way  
Leatherhead KT22 8UX  
United Kingdom